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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
CASE NO: 2:19-cr-025-RFB-VCF
**STIPULATION TO WAIVE DISCLOSURE
REQUIREMENTS OF FED. R. CRIM. P.
32, AND LCR 32-1.**

MATTHEW JOHN CANNON,

Defendant.

IT IS HEREBY STIPULATED AND AGREED by and through NICHOLAS TRUTANICH, United States Attorney, PETER S. LEVITT, Assistant United States Attorney, and defendant MATTHEW CANNON, by and through his counsel LUCAS J. GAFFNEY, ESQ., that the parties waive the disclosure requirements mandated by Fed. R. Crim. P. 32 and LCR 32-1 for the purpose of expediting the Defendant's sentencing.

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1 The instant the Stipulation is entered into for the following reasons:

2 1. On August 13, 2020, the Court conducted a Change of Plea Hearing for
3 Defendant, MATTHEW CANNON [ECF 81]. At the hearing's conclusion
4 CANNON requested an expedited sentencing date. The Court granted
CANNON's request and scheduled sentencing for October 15, 2020.

5 2. In order to accommodate the expedited sentencing date, the parties stipulate to
6 waive the disclosure requirements contained in Federal Rule of Criminal
7 Procedure 32, and United States District Court of Nevada Local Criminal Rule
8 32-1, which mandate the United States probation officer disclose CANNON'S
presentence investigation report ("PSR") to the parties at least 35 days before
sentencing.

9 3. Counsel has contacted United States Probation Officer Sunny Cascio who is
10 assigned to drafting Cannon's PSR. Ms. Cascio indicated she shall make every
11 effort to disclose Cannon's PSR no later than ten (10) days before Cannon's
sentencing hearing.

12 4. Counsel has spoken to MATTHEW CANNON who is in custody and he does
13 not object to waiving the aforementioned disclosure requirements.

14 5. Counsel has spoken to AUSA PETER LEVITT, who does not object to waiving
15 the aforementioned disclosure requirements.

16 DATED: August 20, 2020.

17 Respectfully submitted,

18 */s/ Lucas Gaffney*

19 LUCAS J. GAFFNEY, ESQ.
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20 1050 Indigo Drive, Suite 120
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21 Attorney for Matthew Cannon

22 */s/ Peter Levitt*

PETER S. LEVITT
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Las Vegas, Nevada, 89101
22 Attorney for the United States of America

23 **ORDER**

24 IT IS SO ORDERED



25 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

26 DATE: September 3, 2020.